

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DR. RUTH C. MAY, DR. DONNA E.
LEDGERWOOD, JUSTIN REED, MARK
HOWARTH and JEFFREY KNAPP, *on
behalf of themselves and all others similarly
situated,*

Plaintiffs,

v.

BARCLAYS PLC, BARCLAYS BANK
PLC, JAMES E. STALEY, TUSHAR
MORZARIA, STEVEN EWART, C.S.
VENKATAKRISHNAN, TIM THROSBY,
ANNA CROSS, NIGEL HIGGINS, ALEX
THURSBY, HELEN KEELAN, HÉLÈNE
VAN DORT, JEREMY SCOTT, MARIA
RICHTER, and DOES 1-12,

Defendants.

Case No: 23-cv-2583 (LJL)

LEAD PLAINTIFFS' NOTICE OF MOTION FOR RECONSIDERATION

Please take notice that upon (1) Lead Plaintiffs' Memorandum of Law in Support of Their Motion for Reconsideration, including the attached exhibit, and (2) all prior pleadings and proceedings had herein, Lead Plaintiffs Dr. Ruth C. May, Dr. Donna E. Ledgerwood, Justin Reed, Mark Howarth, and Jeffrey Knapp, will move this Court, before the Honorable Lewis J. Liman, United States District Judge, in Courtroom 15C, 500 Pearl Street, New York, New York, on a date and time designated by this Court, for an Order under Rules 59(e) and 60(b) that amends its March 21, 2025 Opinion and Order (Doc. 96) to deny Defendants' motion to dismiss Plaintiffs' Section 11 and Section 12(a)(1) claims from their Second Amended Complaint or, in the alternative, grant Plaintiffs leave to file an amended complaint to add allegations in support of their Section 11 and Section 12(a)(1) claims, and to grant Plaintiffs any other relief the Court deems appropriate,

Dated: April 18, 2025

Respectfully submitted,

SBAITI & COMPANY PLLC

/s/ Jonathan Bridges

Mazin A. Sbaiti

New York Bar No. 4339057

Jonathan Bridges (Admitted *Pro Hac Vice*)

Texas Bar No. 24028835

Kevin N. Colquitt (Admitted *Pro Hac Vice*)

Texas Bar No. 24072047

Griffin S. Rubin (Admitted *Pro Hac Vice*)

Texas Bar No. 24121809

2200 Ross Avenue – Suite 4900W

Dallas, TX 75201

T: (214) 432-2899

F: (214) 853-4367

E: mas@sbaitilaw.com

jeb@sbaitilaw.com

knc@sbaitilaw.com

gsr@sbaitilaw.com

Counsel for Lead Plaintiffs